

EXHIBIT A

Samuel R. Miller (SBN 66871)
 srmiller@sidley.com
 Marie L. Fiala (SBN 79676)
 mfiala@sidley.com
 Ryan M. Sandrock (SBN 251781)
 rsandrock@sidley.com
 Robert B. Martin III (SBN 235489)
 rbmartin@sidley.com
 SIDLEY AUSTIN LLP
 555 California Street, 20th Floor
 San Francisco, California 94104
 Telephone: (415) 772-1200
 Facsimile: (415) 772-7400

Attorneys For Defendant
 LG ELECTRONICS, INC

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

**In Re CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION**

No.: M-07-5944 SC
 MDL NO. 1917

This Document Relates to:

Judge: Hon. Samuel Conti
 Special Master: Hon. Charles A. Legge
 (Ret.)

DIRECT PURCHASER ACTION

**LGE's FIRST SET OF REQUESTS FOR
 PRODUCTION TO THE DIRECT
 PURCHASER PLAINTIFFS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure,
 Defendants LG Electronics, Inc. ("LGE") hereby request that the Direct Purchaser Plaintiffs
 ("Plaintiffs") in the above-captioned action respond to the following first set of requests for
 production (the "Document Requests"). Plaintiffs are directed to serve the requested
 documents in conformance with the above-cited rules at the offices of Sidley Austin LLP,
 Attn: Ryan M. Sandrock, 555 California Street, San Francisco, CA 94110 (or at such other
 place as may be agreed upon by the parties), within thirty (30) days after the date of the
 service hereof.

DEFINITIONS AND INSTRUCTIONS

1. For the purposes of these Document Requests, the following definitions apply:

- a. "Action" means the above-captioned consolidated class action.
- b. "All" shall be construed as all, each, any, and every.
- c. "And" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the Document Requests all information that might otherwise be construed to be outside of their scope.
- d. "Complaint" means Plaintiffs' Consolidated Amended Complaint in the Action, filed in the United States District Court for the Northern District of California on March 16, 2009.
- e. "CRTs" means cathode ray tubes, as defined in Paragraph 1 of the Complaint.
- f. "Defendants" means all entities enumerated in Paragraphs 24-80 of the Complaint.
- g. "Document(s)" means "documents" as defined in the Federal Rules of Civil Procedure, including but not limited to any written, printed, typed, recorded, filmed, punched, transcribed, taped or other graphic matter of any kind or nature, however produced or reproduced, whether in hard copy, electronic, or other form, and includes, without limitation, pamphlets, brochures, books, booklets, information sheets, papers, articles, journals, magazines, computer printouts, Internet search results, tapes, discs or other forms of audio, visual or audio/visual recordings, records, memoranda, reports, financial statements, affidavits, handwritten and other notes, transcripts, paper, indices, letters, envelopes, telegrams, cables, electronic mail messages, telex messages, telecopied messages, telephone messages, summaries or records of telephone conversations, summaries or records of

1 personal conversations or interviews, summaries or records of meetings or
 2 conferences, minutes or transcriptions or notations of meetings or
 3 telephone conversations or other communications of any type, tabulations,
 4 studies, analyses, evaluations, projections, work papers, statements,
 5 summaries, opinions, journals, desk calendars, product labels,
 6 maintenance or service records, appointment books, diaries, billing
 7 records, checks, bank account statements, and invoices.

8 h. The use of the term "Interrogatory" refers to those interrogatories in the
 9 First Set of Interrogatories of Defendant LG Electronics, Inc. to the
 10 Direct Purchaser Plaintiffs, dated March 8, 2010.

11 i. "LGE Defendants" means Defendants LGE and/or LG Electronics
 12 USA, Inc. or LG Electronics Taiwan Taipei Co., Ltd.

13 j. "You" and "Your" means the Direct Purchaser Plaintiffs in the Action,
 14 their direct and indirect parents, predecessors in interest, affiliates,
 15 subsidiaries, divisions, predecessors, successors, and assigns, the
 16 present and former officers, directors, employees, attorneys, agents, and
 17 representatives of any of the above, and all persons acting or purporting
 18 to act on their behalf.

19 B. These Document Requests cover all Documents and information in Your
 20 possession, custody, or control, including information in the possession of any of Your
 21 attorneys, agents, servants, representatives, consultants, or other persons directly or indirectly
 22 employed, retained by, or in privity with You, or anyone else acting on Your behalf or subject
 23 to Your control.

24 C. For each Document requested, produce the entire original Document, along
 25 with all attachments, appendices, enclosures and exhibits, and any copies that are not identical
 26 to the original (whether because of notes made on, or attached to, such copy or otherwise),
 27

1 regardless of whether you consider the attachments, appendices, enclosures and exhibits to be
2 relevant or responsive to these requests.

3 D. If any Document is withheld under a claim of privilege or is not produced for
4 whatever reason, You must:

5 a. state with specificity the claim of privilege or other reason used to
6 withhold the Document from production; and

7 b. identify each Document by (i) date; (ii) name, occupation, and capacity
8 of the author; (iii) name, occupation, and capacity of the individual to
9 whom the allegedly privileged matter emanated; and (iv) subject matter,
10 without disclosing the Document's contents, in a manner sufficient to
11 allow it to be described to the Court for a ruling on privilege or other
12 reasons asserted.

13 E. If You object to any portion of the Document Requests, provide all information
14 called for by that portion of the Document Requests to which You do not object. State with
15 reasonable particularity the reason for Your objection to the remainder.

16 F. If, in responding to a request, You claim any ambiguity in interpreting either the
17 Document Requests, or an applicable definition or instruction, such claim shall not be used as a
18 basis for refusing to respond, but You should set forth as part of Your response the language
19 deemed to be ambiguous and the interpretation chosen or used in responding to the Document
20 Requests.

21 G. Each page or sheet produced by You is to be marked with consecutive document
22 control numbers.

23 H. Identify any and all Documents requested by the Document Requests that have
24 been destroyed.

25 I. Electronic records and computerized information should be produced in an
26 intelligible format or together with a description of the system from which they are derived,
27 sufficient to permit rendering the material intelligible.

1 J. The singular form of any noun or pronoun includes the plural, and vice versa.

2 K. Terms in the present tense include terms in the past tense, and terms in the past
3 tense include terms in the present tense.

4 **REQUESTS FOR PRODUCTION**

5 **Document Request No. 1:**

6 All Documents that support Your response to Interrogatory No. 1.

7 **Document Request No. 2:**

8 All Documents that support Your response to Interrogatory No. 2.

9 **Document Request No. 3:**

10 All Documents that support Your response to Interrogatory No. 3.

11 **Document Request No. 4:**

12 All Documents that support Your response to Interrogatory No. 4.

13
14 Dated: March 8, 2010

By: 

Samuel R. Miller (SBN 66871)
srmler@sidley.com
Marie L. Fiala (SBN 79676)
mfiala@sidley.com
Ryan M. Sandrock (SBN 251781)
rsandrock@sidley.com
Robert B. Martin III (SBN 235489)
rbmartin@sidley.com
SIDLEY AUSTIN LLP
555 California Street, 20th Floor
San Francisco, California 94104
Telephone: (415) 772-1200
Facsimile: (415) 772-7400

Attorneys For Defendant
LG ELECTRONICS, INC

Samuel R. Miller (SBN 66871)
 srmiller@sidley.com
 Marie L. Fiala (SBN 79676)
 mfiala@sidley.com
 Ryan M. Sandrock (SBN 251781)
 rsandrock@sidley.com
 Robert B. Martin III (SBN 235489)
 rbmartin@sidley.com
 SIDLEY AUSTIN LLP
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Attorneys For Defendant
 LG ELECTRONICS, INC

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

**In Re CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION**

No.: M-07-5944 SC
 MDL NO. 1917

This Document Relates to:

Judge: Hon. Samuel Conti
 Special Master: Hon. Charles A. Legge
 (Ret.)

DIRECT PURCHASER ACTION

**LGE's FIRST SET OF
 INTERROGATORIES TO THE
 DIRECT PURCHASER PLAINTIFFS**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure,
 Defendants LG Electronics, Inc. ("LGE") hereby request that the Direct Purchaser Plaintiffs
 ("Plaintiffs") in the above-captioned action respond to the following first set of interrogatories
 (the "Interrogatories"). Plaintiffs are directed to serve their verified answers in conformance
 with the above-cited rules at the offices of Sidley Austin LLP, Attn: Ryan M. Sandrock, 555
 California Street, San Francisco, CA 94110 (or at such other place as may be agreed upon by
 the parties), within thirty (30) days after the date of the service hereof.

DEFINITIONS

For the purposes of these Interrogatories, the following definitions apply:

A. "Action" means the above-captioned consolidated class action.

B. "And" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the Interrogatories all information that might otherwise be construed to be outside of their scope.

C. "Complaint" means Plaintiffs' Consolidated Amended Complaint in the Action, filed in the United States District Court for the Northern District of California on March 16, 2009.

D. "CRTs" means cathode ray tubes, as defined in Paragraph 1 of the Complaint.

E. "Defendants" means all entities enumerated in Paragraphs 24-80 of the Complaint.

F. "Document(s)" means "documents" as defined in the Federal Rules of Civil Procedure, including but not limited to any written, printed, typed, recorded, filmed, punched, transcribed, taped or other graphic matter of any kind or nature, however produced or reproduced, whether in hard copy, electronic, or other form, and includes, without limitation, pamphlets, brochures, books, booklets, information sheets, papers, articles, journals, magazines, computer printouts, Internet search results, tapes, discs or other forms of audio, visual or audio/visual recordings, records, memoranda, reports, financial statements, affidavits, handwritten and other notes, transcripts, paper, indices, letters, envelopes, telegrams, cables, electronic mail messages, telex messages, telecopied messages, telephone messages, summaries or records of telephone conversations, summaries or records of personal conversations or interviews, summaries or records of meetings or conferences, minutes or transcriptions or notations of meetings or telephone conversations or other communications of any type, tabulations, studies, analyses, evaluations, projections, work papers, statements, summaries, opinions, journals, desk calendars, product labels, maintenance or service records, appointment books, diaries, billing records, checks, bank account statements, and invoices.

1 G. "Each" means all, each, and every.

2 H. "LGE Defendants" means Defendants LGE and/or LG Electronics USA, Inc.
3 or LG Electronics Taiwan Taipei Co., Ltd.

4 I. "Person(s)" means and includes all natural persons or entities, governmental
5 units, partnerships, firms, corporations, associations, joint ventures, any other form of
6 business organization or arrangement, or any form of public, private or legal entity.

7 J. "You" and "Your" means the Direct Purchaser Plaintiffs in the Action, their
8 direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions,
9 predecessors, successors, and assigns, the present and former officers, directors, employees,
10 attorneys, agents, and representatives of any of the above, and all persons acting or purporting
11 to act on their behalf.

12 K. The singular form of any noun or pronoun includes the plural, and vice versa.

13 L. Terms in the present tense include terms in the past tense, and terms in the past
14 tense include terms in the present tense.

15 **GENERAL INSTRUCTIONS**

16 1. Answers to these Interrogatories are to be based upon all knowledge or
17 information available to Plaintiffs, including, but not limited to, all information or knowledge
18 derivable from business or other records, and all knowledge or information possessed by any
19 person, including but not limited to any employee, agent, attorney, expert witness, consultant,
20 representative or other advisor, subject to the instruction, direction or control of Plaintiffs.

21 2. Each Interrogatory is to be answered separately and in order, and shall be
22 construed independently and not by reference to any other Interrogatory.

23 3. Plaintiffs should answer each Interrogatory fully, unless it is objected to, in
24 which event the reasons for the objection should be specifically and separately stated.

25 4. The answers are to be signed by Plaintiffs and the objections, if any, are to be
26 signed by the attorney making them.

27

28 MDL NO. 1917

LGE'S FIRST SET OF INTERROGATORIES

1 5. Where a complete answer to a particular Interrogatory is not possible, the
2 Interrogatory should be answered to the extent possible and a statement should be made
3 indicating why only a partial answer is given, together with the identity of any Documents or
4 sources from which more complete information is obtainable.

5 6. With respect to any Interrogatory that Plaintiffs may allege that they are unable
6 to answer due to insufficient knowledge, Plaintiffs are requested to specify the nature of the
7 inquiries made in an attempt to enable Plaintiffs to answer the Interrogatory, including the
8 identity of any person communicated with in an attempt to enable Plaintiffs to respond fully to
9 the Interrogatory.

10 7. If, in answering these Interrogatories, Plaintiffs claim any ambiguity in
11 interpreting either a particular Interrogatory or a definition or instruction, such claim shall not
12 be utilized as a basis for refusing to answer. Instead, Plaintiffs shall set forth as part of the
13 answer the language deemed to be ambiguous and the interpretation utilized in the response to
14 the Interrogatory.

15 8. When referring to a Person, "identify" means to state the Person's full name,
16 present or last known address, telephone number, present or last known place of employment,
17 and present or last known title at that place of employment. Once a Person has been identified
18 in accordance with this paragraph, only the name of the Person need be listed in response to
19 subsequent discovery requesting the identification of the Person.

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28 MDL NO. 1917

LGE'S FIRST SET OF INTERROGATORIES

INTERROGATORIES

Interrogatory No. 1:

State with specificity the factual basis (including any evidentiary sources) for Your allegation that Defendants conspired, combined and contracted to fix, raise, maintain, and stabilize the price at which computer monitors containing CRTs were sold in the United States, as alleged in, *inter alia*, Paragraph 3 of the Complaint.

Interrogatory No. 2:

State with specificity the factual basis (including any evidentiary sources) for Your allegation that Defendants agreed to allocate market shares and customers of sales of computer monitors containing CRTs, as alleged in, *inter alia*, Paragraphs 5 and 138 of the Complaint.

Interrogatory No. 3:

For each separate defendant (regardless of its affiliation with any other defendant), state with specificity the factual basis (including any Documents, Persons, or other evidentiary sources) for Your allegations that it conspired, combined, and contracted with any of the other Defendants to fix, raise, maintain and/or stabilize the prices of computer monitors containing CRTs sold in the United States, as alleged in, *inter alia*, Paragraph 3 of the Complaint.

Interrogatory No. 4:

For each separate defendant (regardless of its affiliation with any other defendant), state with specificity the factual basis (including any Documents, Persons, or other evidentiary sources) for Your allegations that it agreed to allocate market shares and customers of sales of computer monitors containing CRTs, as alleged in, *inter alia*, Paragraphs 5 and 138 of the Complaint.

///

///

1 **Interrogatory No. 5:**

2 Identify each Person who provided information to answer these Interrogatories.

3
4 Dated: March 8, 2010

By: 

Samuel R. Miller (SBN 66871)

srmler@sidley.com

Marie L. Fiala (SBN 79676)

mfiala@sidley.com

Ryan M. Sandroock (SBN 251781)

rsandroock@sidley.com

Robert B. Martin III (SBN 235489)

rbmartin@sidley.com

SIDLEY AUSTIN LLP

555 California Street, 20th Floor

San Francisco, California 94104

Telephone: (415) 772-1200

Facsimile: (415) 772-7400

Attorneys For Defendant
LG ELECTRONICS, INC

1 STEVEN A. REISS (*Admitted Pro Hac Vice*)
 2 DAVID L. YOHAI (*Admitted Pro Hac Vice*)
 3 DAVID YOLKUT (*Admitted Pro Hac Vice*)
 4 WEIL, GOTSHAL & MANGES LLP
 5 767 Fifth Avenue
 6 New York, New York 10153-0119
 Telephone: (212) 310-8000
 Facsimile: (212) 310-8007
 Email: steven.reiss@weil.com

7 JEFFREY L. KESSLER (*Admitted Pro Hac Vice*)
 8 A. PAUL VICTOR (*Admitted Pro Hac Vice*)
 9 DEWEY & LEBOEUF LLP
 10 1301 Avenue of the Americas
 New York, NY 10019
 Telephone: (212) 259-8000
 Facsimile: (212) 259-7013
 Email: jkessler@dl.com

12 **Attorneys for Defendant MT Picture Display Co., Ltd.**

13 **UNITED STATES DISTRICT COURT**
 14 **NORTHERN DISTRICT OF CALIFORNIA**

15 **In Re CATHODE RAY TUBE (CRT)**
 16 **ANTITRUST LITIGATION**

) No.: M-07-5944 SC
) MDL NO. 1917
)

17 _____
 18 This Document Relates to:

) Judge: Hon. Samuel Conti
) Special Master: Hon. Charles A. Legge
) (Ret.)

19 DIRECT PURCHASER ACTION

) **THE FIRST SET OF**
) **INTERROGATORIES OF**
) **DEFENDANT MT PICTURE**
) **DISPLAY CO., LTD. TO THE**
) **DIRECT PURCHASER PLAINTIFFS**
)

24 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure,
 25 Defendant MT Picture Display Co., Ltd. ("MTPD") hereby requests that the Direct Purchaser
 26 Plaintiffs ("Plaintiffs") in the above-captioned action respond to the following first set of
 27 interrogatories (the "Interrogatories"). Plaintiffs are directed to serve their verified answers
 28

1 in conformance with the above-cited rules at the offices of WEIL, GOTSHAL & MANGES
2 LLP, Attn: David L. Yohai, 767 Fifth Avenue, New York, New York, 10153 (or at such other
3 place as may be agreed upon by the parties), within thirty (30) days after the date of the
4 service hereof.

5 **DEFINITIONS**

6 For the purposes of these Interrogatories, the following definitions apply:

7 A. "Action" means the above-captioned consolidated class action.

8 B. "And" and "or" shall be construed either disjunctively or conjunctively as
9 necessary to bring within the scope of the Interrogatories all information that might otherwise
10 be construed to be outside of their scope.

11 C. "Complaint" means Plaintiffs' Consolidated Amended Complaint in the Action,
12 filed in the United States District Court for the Northern District of California on March 16,
13 2009.

14 D. "CRTs" means cathode ray tubes, as defined in Paragraph 1 of the Complaint.

15 E. "Defendants" means all entities enumerated in Paragraphs 24-80 of the
16 Complaint.

17 F. "Document(s)" means "documents" as defined in the Federal Rules of Civil
18 Procedure, including but not limited to any written, printed, typed, recorded, filmed, punched,
19 transcribed, taped or other graphic matter of any kind or nature, however produced or reproduced,
20 whether in hard copy, electronic, or other form, and includes, without limitation, pamphlets,
21 brochures, books, booklets, information sheets, papers, articles, journals, magazines, computer
22 printouts, Internet search results, tapes, discs or other forms of audio, visual or audio/visual
23 recordings, records, memoranda, reports, financial statements, affidavits, handwritten and other
24 notes, transcripts, paper, indices, letters, envelopes, telegrams, cables, electronic mail messages,
25

1 telex messages, telecopied messages, telephone messages, summaries or records of telephone
2 conversations, summaries or records of personal conversations or interviews, summaries or
3 records of meetings or conferences, minutes or transcriptions or notations of meetings or
4 telephone conversations or other communications of any type, tabulations, studies, analyses,
5 evaluations, projections, work papers, statements, summaries, opinions, journals, desk calendars,
6 product labels, maintenance or service records, appointment books, diaries, billing records,
7 checks, bank account statements, and invoices.

8
9 G. "Each" means all, each, and every.

10 H. When referring to a Person, "Identify" means to state, to the extent known, the
11 Person's full name, present or last known address, and when referring to a natural person,
12 additionally, the present or last known place of employment. Once a Person has been
13 identified in accordance with this subparagraph, only the name of the Person need be listed in
14 response to subsequent discovery requesting the identification of that Person.

15
16 I. When referring to a Person, "Identity" means, to the extent known, the
17 Person's full name, present or last known address, and when referring to a natural person,
18 additionally, the present or last known place of employment. Once a Person has been
19 identified in accordance with this subparagraph, only the name of the Person need be listed in
20 response to subsequent discovery requesting the identification of that Person.

21 J. When referring to a Document, "Identity" means, to the extent known, the (i)
22 type of document; (ii) general subject matter; (iii) date of the document; and (iv) author(s),
23 addressee(s) and recipient(s).

24
25 K. "Person(s)" means and includes all natural persons or entities, governmental
26 units, partnerships, firms, corporations, associations, joint ventures, any other form of
27 business organization or arrangement, or any form of public, private or legal entity.

1 L. "You" and "Your" means the Direct Purchaser Plaintiffs in the Action, their
 2 direct and indirect parents, predecessors in interest, affiliates, subsidiaries, divisions,
 3 predecessors, successors, and assigns, the present and former officers, directors, employees,
 4 attorneys, agents, and representatives of any of the above, and all persons acting or purporting
 5 to act on their behalf.

6 M. The singular form of any noun or pronoun includes the plural, and vice versa.

7 N. Terms in the present tense include terms in the past tense, and terms in the past
 8 tense include terms in the present tense.

10 GENERAL INSTRUCTIONS

11 1. Answers to these Interrogatories are to be based upon all knowledge or
 12 information available to Plaintiffs, including, but not limited to, all information or knowledge
 13 derivable from business or other records, and all knowledge or information possessed by any
 14 person, including but not limited to any employee, agent, attorney, expert witness, consultant,
 15 representative or other advisor, subject to the instruction, direction or control of Plaintiffs.

16 2. Each Interrogatory is to be answered separately and in order, and shall be
 17 construed independently and not by reference to any other Interrogatory.

18 3. Plaintiffs should answer each Interrogatory fully, unless it is objected to, in
 19 which event the reasons for the objection should be specifically and separately stated.

20 4. The answers are to be signed by Plaintiffs and the objections, if any, are to be
 21 signed by the attorney making them.

22 5. Where a complete answer to a particular Interrogatory is not possible, the
 23 Interrogatory should be answered to the extent possible and a statement should be made
 24 indicating why only a partial answer is given, together with the identity of any Documents or
 25 sources from which more complete information is obtainable.

6. With respect to any Interrogatory that Plaintiffs may allege that they are unable to answer due to insufficient knowledge, Plaintiffs are requested to specify the nature of the inquiries made in an attempt to enable Plaintiffs to answer the Interrogatory, including the identity of any person communicated with in an attempt to enable Plaintiffs to respond fully to the Interrogatory.

7. If, in answering these Interrogatories, Plaintiffs claim any ambiguity in interpreting either a particular Interrogatory or a definition or instruction, such claim shall not be utilized as a basis for refusing to answer. Instead, Plaintiffs shall set forth as part of the answer the language deemed to be ambiguous and the interpretation utilized in the response to the Interrogatory.

INTERROGATORIES

Interrogatory No. 1:

Identify each Person who provided information to answer these Interrogatories.

Interrogatory No. 2:

State with specificity the factual basis (including the Identity of each Document, Person or other evidentiary source upon which You rely) for Your allegation that Defendants conspired, combined and contracted to fix, raise, maintain, and stabilize the price at which televisions containing CRTs were sold in the United States, as alleged in, *inter alia*, Paragraph 3 of the Complaint.

Interrogatory No. 3:

State with specificity the factual basis (including the Identity of each Document, Person or other evidentiary source upon which You rely) for Your allegation that Defendants conspired, combined and contracted to fix, raise, maintain, and stabilize the price

1 at which products containing CRTs, other than televisions and computer monitors, were sold
2 in the United States, as alleged in, *inter alia*, Paragraph 3 of the Complaint.

3 **Interrogatory No. 4:**

4 State with specificity the factual basis (including the Identity of each
5 Document, Person or other evidentiary source upon which You rely) for Your allegation that
6 Defendants agreed to allocate market shares and customers of sales of televisions containing
7 CRTs, as alleged in, *inter alia*, Paragraphs 5 and 138 of the Complaint.

8 **Interrogatory No. 5:**

9 State with specificity the factual basis (including the Identity of each
10 Document, Person or other evidentiary source upon which You rely) for Your allegation that
11 Defendants agreed to allocate market shares and customers of sales of products containing
12 CRTs, other than televisions and computer monitors, as alleged in, *inter alia*, Paragraphs 5
13 and 138 of the Complaint.

14 **Interrogatory No. 6:**

15 For each separate Defendant (regardless of its affiliation with any other
16 defendant), state with specificity the factual basis (including the Identity of each Document,
17 Person or other evidentiary source upon which You rely) for Your allegations that it conspired,
18 combined and contracted with any of the other Defendants to fix, raise, maintain, and stabilize
19 the price at which televisions containing CRTs were sold in the United States, as alleged in,
20 *inter alia*, Paragraph 3 of the Complaint, or agreed with any of the other Defendants to
21 allocate market shares and customers of sales of televisions containing CRTs, as alleged in,
22 *inter alia*, Paragraphs 5 and 138 of the Complaint.

1 Dated: March 8, 2010

By: 

GREGORY D. HULL (57367)
Email: greg.hull@weil.com
WEIL, GOTSHAL & MANGES LLP
201 Redwood Shores Parkway
Redwood Shores, California 94065-1175
Telephone: (650) 802-3000
Facsimile: (650) 802-3100

STEVEN A. REISS (*pro hac vice*)
Email: steven.reiss@weil.com
DAVID L. YOHAI (*pro hac vice*)
Email: david.yohai@weil.com
DAVID E. YOLKUT (*pro hac vice*)
Email: david.yolkut@weil.com
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153-0119
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

JEFFREY L. KESSLER (*pro hac vice*)
Email: jkessler@dl.com
A. PAUL VICTOR (*pro hac vice*)
Email: pvictor@dl.com
DEWEY & LEBOEUF LLP
1301 Avenue of the Americas
New York, NY 10019
Telephone: (212) 259-8000
Facsimile: (212) 259-7013

*Attorneys for Defendant MT Picture
Display Co., Ltd.*

STEVEN A. REISS (*Admitted Pro Hac Vice*)
 DAVID L. YOHAI (*Admitted Pro Hac Vice*)
 DAVID YOLKUT (*Admitted Pro Hac Vice*)
 WEIL, GOTSHAL & MANGES LLP
 767 Fifth Avenue
 New York, New York 10153-0119
 Telephone: (212) 310-8000
 Facsimile: (212) 310-8007
 Email: steven.reiss@weil.com

JEFFREY L. KESSLER (*Admitted Pro Hac Vice*)
 A. PAUL VICTOR (*Admitted Pro Hac Vice*)
 DEWEY & LEBOEUF LLP
 1301 Avenue of the Americas
 New York, NY 10019
 Telephone: (212) 259-8000
 Facsimile: (212) 259-7013
 Email: jkessler@dl.com

Attorneys for Defendant MT Picture Display Co., Ltd.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

**In Re CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION**

No.: M-07-5944 SC
 MDL NO. 1917

This Document Relates to:

Judge: Hon. Samuel Conti
 Special Master: Hon. Charles A. Legge
 (Ret.)

DIRECT PURCHASER ACTION

**THE FIRST SET OF DOCUMENT
 REQUESTS OF DEFENDANT
 MT PICTURE DISPLAY CO., LTD.
 TO THE DIRECT PURCHASER
 PLAINTIFFS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure,

Defendant MT Picture Display Co., Ltd. ("MTPD") hereby requests that the Direct Purchaser Plaintiffs ("Plaintiffs") in the above-captioned action respond to the following first set of document requests (the "Document Requests"). Plaintiffs are directed to serve the requested

documents for inspection and copying in conformance with the above-cited rules at the offices of WEIL, GOTSHAL & MANGES LLP, Attn: David L. Yohai, 767 Fifth Avenue, New York, New York, 10153 (or at such other place as may be agreed upon by the parties), within thirty (30) days after the date of the service hereof.

DEFINITIONS AND INSTRUCTIONS

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 - e. "CRTs" means cathode ray tubes, as defined in Paragraph 1 of the Complaint.
 - f. "Defendants" means all entities enumerated in Paragraphs 24-80 of the Complaint.
 - g. "Document(s)" means "documents" as defined in the Federal Rules of Civil Procedure, including but not limited to any written, printed, typed, recorded, filmed, punched, transcribed, taped or other graphic matter of any kind or nature, however produced or reproduced, whether in hard copy, electronic, or other form, and includes, without limitation, pamphlets,

1 brochures, books, booklets, information sheets, papers, articles, journals,
2 magazines, computer printouts, Internet search results, tapes, discs or other
3 forms of audio, visual or audio/visual recordings, records, memoranda,
4 reports, financial statements, affidavits, handwritten and other notes,
5 transcripts, paper, indices, letters, envelopes, telegrams, cables, electronic
6 mail messages, telex messages, telecopied messages, telephone messages,
7 summaries or records of telephone conversations, summaries or records of
8 personal conversations or interviews, summaries or records of meetings or
9 conferences, minutes or transcriptions or notations of meetings or
10 telephone conversations or other communications of any type, tabulations,
11 studies, analyses, evaluations, projections, work papers, statements,
12 summaries, opinions, journals, desk calendars, product labels,
13 maintenance or service records, appointment books, diaries, billing
14 records, checks, bank account statements, and invoices.
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17 h. The use of the term "Interrogatory" refers to those interrogatories in the
18 First Set of Interrogatories of Defendant MT Picture Display Co., Ltd.
19 to the Direct Purchaser Plaintiffs, dated March 8, 2010.

20 i. "You" and "Your" means the Direct Purchaser Plaintiffs in the Action,
21 their direct and indirect parents, predecessors in interest, affiliates,
22 subsidiaries, divisions, predecessors, successors, and assigns, the
23 present and former officers, directors, employees, attorneys, agents, and
24 representatives of any of the above, and all persons acting or purporting
25 to act on their behalf.
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1 2. These Document Requests cover all Documents and information in Your
2 possession, custody, or control, including information in the possession of any of Your
3 attorneys, agents, servants, representatives, consultants, or other persons directly or indirectly
4 employed, retained by, or in privity with You, or anyone else acting on Your behalf or subject
5 to Your control.

6 3. For each Document requested, produce the entire original Document, along
7 with all attachments, appendices, enclosures and exhibits, and any copies that are not identical
8 to the original (whether because of notes made on, or attached to, such copy or otherwise),
9 regardless of whether you consider the attachments, appendices, enclosures and exhibits to be
10 relevant or responsive to these requests.

11 4. If any Document is withheld under a claim of privilege or is not produced for
12 whatever reason, You must:
13

- 14 a. state with specificity the claim of privilege or other reason used to
15 withhold the Document from production; and
16 b. identify each Document by (i) date; (ii) name, occupation, and capacity
17 of the author; (iii) name, occupation, and capacity of the individual to
18 whom the allegedly privileged matter emanated; and (iv) subject matter,
19 without disclosing the Document's contents, in a manner sufficient to
20 allow it to be described to the Court for a ruling on privilege or other
21 reasons asserted.
22

23 5. If You object to any portion of the Document Requests, provide all information
24 called for by that portion of the Document Requests to which You do not object. State with
25 reasonable particularity the reason for Your objection to the remainder.
26
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28

1 6. If, in responding to a request, You claim any ambiguity in interpreting either the
2 Document Requests, or an applicable definition or instruction, such claim shall not be used as a
3 basis for refusing to respond, but You should set forth as part of Your response the language
4 deemed to be ambiguous and the interpretation chosen or used in responding to the Document
5 Requests.

6 7. Each page or sheet produced by You is to be marked with consecutive document
7 control numbers.

8 8. Identify any and all Documents requested by the Document Requests that have
9 been destroyed.

10 9. Electronic records and computerized information should be produced in an
11 intelligible format or together with a description of the system from which they are derived,
12 sufficient to permit rendering the material intelligible.

13 10. The singular form of any noun or pronoun includes the plural, and vice versa.

14 11. Terms in the present tense include terms in the past tense, and terms in the past
15 tense include terms in the present tense.

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18 **DOCUMENT REQUESTS**

19 **Document Request No. 1:**

20 All Documents that support Your response to Interrogatory No. 2.

21 **Document Request No. 2:**

22 All Documents that support Your response to Interrogatory No. 3.

23 **Document Request No. 3:**

24 All Documents that support Your response to Interrogatory No. 4.

25 **Document Request No. 4:**

26 All Documents that support Your response to Interrogatory No. 5.

Document Request No. 5:

All Documents that support Your response to Interrogatory No. 6.

Document Request No. 6:

All other Documents that purportedly support Your allegations that Defendants conspired, combined and contracted to fix, raise, maintain, and stabilize the price at which finished products containing CRTs were sold in the United States, or agreed to allocate market shares and customers of sales of finished products containing CRTs.

Dated: March 8, 2010

By: 

GREGORY D. HULL (57367)
Email: greg.hull@weil.com
WEIL, GOTSHAL & MANGES LLP
201 Redwood Shores Parkway
Redwood Shores, California 94065-1175
Telephone: (650) 802-3000
Facsimile: (650) 802-3100

STEVEN A. REISS (*pro hac vice*)
Email: steven.reiss@weil.com
DAVID L. YOHAI (*pro hac vice*)
Email: david.yohai@weil.com
DAVID E. YOLKUT (*pro hac vice*)
Email: david.yolkut@weil.com
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153-0119
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

JEFFREY L. KESSLER (*pro hac vice*)
Email: jkessler@dl.com
A. PAUL VICTOR (*pro hac vice*)
Email: pvictor@dl.com
DEWEY & LEBOEUF LLP
1301 Avenue of the Americas
New York, NY 10019
Telephone: (212) 259-8000
Facsimile: (212) 259-7013

*Attorneys for Defendant MT Picture
Display Co., Ltd.*